

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

FERNANDO RANGEL,	:	
	:	No. 5:13-cv-00843-HLH
Plaintiff,	:	
	:	
vs.	:	CLASS ACTION
	:	
CARDELL CABINETRY, LLC,	:	
	:	JURY TRIAL DEMANDED
Defendant.	:	

ERIC DEAN GIBSON,	:	
	:	No. 5:13-cv-00890-XR
Plaintiff,	:	
	:	
vs.	:	CLASS ACTION
	:	
CARDELL CABINETRY, LLC,	:	
	:	JURY TRIAL DEMANDED
Defendant.	:	

PLAINTIFF FERNANDO RANGEL'S CROSS-MOTION TO
CONSOLIDATE THE RELATED CARDELL CASES

For the reasons set forth in the accompanying Memorandum of Law, the above-captioned *Gibson* and *Rangel* cases should be consolidated pursuant to Rule 42 of the Federal Rules of Civil Procedure. In addition, the *Gibson* plaintiff's motion for the appointment of lead and liaison counsel should be denied without prejudice.

A proposed order granting this relief is submitted herewith.

Dated: October 7, 2013

Respectfully submitted,

/s/ Michael A. Caddell

Michael A. Caddell

CADDELL & CHAPMAN

1331 Lamar, Suite 1070

Houston, Texas 77010-3027

Tel: (713) 751-0400

Fax: (713) 751-0906

MAC@caddellchapman.com

Joseph G. Sauder (pro hac vice)

Matthew D. Schelkopf (pro hac vice)

Benjamin F. Johns (pro hac vice)

CHIMICLES & TIKELLIS LLP

One Haverford Centre

361 West Lancaster Avenue

Haverford, PA 19041

Telephone: (610) 642-8500

Facsimile: (610) 649-3633

E-mail: JosephSauder@chimicles.com

MatthewSchelkopf@chimicles.com

BFJ@chimicles.com

Counsel for Plaintiff and the Class

Certificate of Service

I, Michael A. Caddell, certify that on this 7th day of October, 2013, I caused the foregoing Motion, Memorandum and Proposed Order to be filed in the above captioned cases using the Court's CM/ECF system, thereby serving these materials upon all registered counsel of record in these cases. I further certify that I mailed these materials upon the following parties:

Cardell Cabinetry, LLC
3215 N. Pan Am Expressway
San Antonio, Texas 78219

/s/ Michael A. Caddell
Michael A. Caddell